



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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June 12, 2025

By E-mail

The Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Abdelhak, et al.
Docket No. 25-MJ-211

Dear Judge Scanlon:

The government submits this letter regarding the removal proceeding that is scheduled for tomorrow, June 13, 2025, in the above-captioned matter, in which five defendants charged by complaint in the Northern District of New York were arrested in this District today.

The government sincerely apologizes for its inability to provide the Court with at least 24 hours' notice of these arrests. The U.S. Attorney's Office for the Eastern District of New York ("the Office") first learned of a general plan to arrest four of the five defendants in this proceeding late afternoon yesterday, June 12, 2025.¹ After the Office was made aware of this plan, it sought additional information as to the particular defendants to be arrested, which it did not receive until significantly after the close of business last night. Given that the Court was closed when the Office received this information, the Office provided the information to the Court shortly before the Court opened this morning (at 8:23 a.m.). Although our Office is familiar with the Eastern District of New York's preference of having at least 24 hours' notice of multi-defendant arrests, other districts likely are not aware of this local practice. We apologize that we were unable to adhere to the Court's preference in this instance and for any inconvenience it has caused the Court.

The government understands that the Court has requested the presence of Drug Enforcement Administration ("DEA") Special Agent Michelle O'Toole at the removal proceeding scheduled for tomorrow. Special Agent O'Toole, who works out of the DEA's Long Island office, is not one of the case agents assigned to the underlying investigation and did not participate in the arrests of any of the defendants in this case. Her responsibility with respect to

¹ The Office had previously been given a different date for the anticipated arrests.

this proceeding was limited to helping coordinate the defendants' appearances in this District while the case and arresting agents were conducting post-arrest interviews of the defendants, which occurred on Long Island, near where the defendants were arrested.² Accordingly, while Special Agent O'Toole will be at the removal proceeding tomorrow per the Court's instructions, the government wanted to make the Court aware that Special Agent O'Toole was not responsible for any decisions regarding the timing of the arrests and the notice provided to the Court.

The Office apologizes again for any inconvenience it has caused the Court. Supervisors in the Office's General Crimes Section, including Assistant United States Attorneys Nadia Moore, Michael Gibaldi, and Philip Pilmar, are happy to make themselves available to the Court to discuss this matter further, should the Court find it helpful.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
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² Because the defendants' post-arrest interviews on Long Island had not concluded by mid-morning today, the government determined that the defendants would likely not be present at the courthouse by the 2 p.m. deadline for arraignments and other initial proceedings. Accordingly, the government notified the magistrate clerks that the removal proceeding in this matter would likely occur tomorrow, June 13, 2025.